

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

IN RE: )  
 )  
KANSAS CITY UNITED METHODIST ) Chapter 11  
RETIREMENT HOME, INC., d/b/a )  
KINGSWOOD SENIOR LIVING ) Case No. 21-41049-11-CAN  
COMMUNITY, )  
 )  
Debtor. )

**NOTICE OF DESIGNATION AS  
COMPLEX CHAPTER 11 BANKRUPTCY CASE**

This bankruptcy case was filed on August 18, 2021. Debtor as the undersigned party in interest believes that this case qualifies under L.R. 1002-2 as a Complex Chapter 11 Bankruptcy Case because:

X There is a need for emergency consideration of the following “first day” motions:

- (1) Motion for Entry of Interim and Final Orders Authorizing Use of Cash Collateral and Providing Adequate Protection (interim hearing only);
- (2) Motion for Authorization to Pay Prepetition Claims of Critical Vendors and Contractors;
- (3) Application for Approval of Payment of Prepetition Payroll (to the limit provided by § 507);
- (4) Motion for Order Authorizing Maintenance of Cash Management System and Continued Use of Certain Existing Bank Accounts, Investment and Deposit Practices, and Certain Business Forms;
- (5) Application for Determination of Adequate Assurance of Payment to Utilities;
- (6) Motion for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Patient Information;

- (7) Motion for Entry of Order Authorizing Debtor to (I) Escrow Post-Petition Entrance Fees and (II) Refund Certain Resident Entrance Fees; and
- (8) Motion for Entry of an Order Authorizing the Debtor to Assume the Plan Support Agreement.

X The Debtor has total debt of more than \$50 million and unsecured non-priority debt of more than \$4 million;

X There are more than 400 parties in interest in this case; and

X Claims against the Debtor are publicly traded.

Respectfully submitted,

McDOWELL, RICE, SMITH & BUCHANAN

By: /s/ Jonathan A. Margolies  
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ATTORNEYS FOR DEBTOR

**CERTIFICATE OF SERVICE**

On August 18, 2021, the above and foregoing was filed with the United States Bankruptcy Court for the Western District of Missouri using the CM/ECF Electronic court filing system with notification to all parties requesting electronic notification as well as service via e-mail or fax and United States Mail, postage prepaid, to:

Daniel Bleck, Esq.  
Mintz, Levin, Cohn, Ferris,  
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*/s/ Jonathan A. Margolies*  
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Attorney for Debtors